



Foothill Transit
Going Good Places

Ritta Merza
19-9-41

October 23, 2019

Mary Nichols, Chairwoman
California Air Resources
Board 1001 I Street
Sacramento, CA 95814

RE: Maximize Investment in Zero-Emission Buses in FY 2019-20 Funding Plan for Clean Transportation Incentives

Chairwoman Nichols and Board Members:

On behalf of Foothill Transit, I respectfully urge the California Air Resources Board to maximize the state's investment in zero-emission buses (ZEBs) and supporting infrastructure. Increased funding will support Foothill Transit's implementation of the Innovative Clean Transit (ICT) regulation while avoiding adverse impacts to our core transit service.

Foothill Transit is a primary public transit provider in the Pomona and San Gabriel Valleys of eastern Los Angeles County. Since our first deployment of battery electric buses in 2010, Foothill Transit has been a leader in transportation electrification efforts. Today, we have 33 battery electric buses in operation and two more battery electric double deck buses slated to start service in Spring 2020. Although Foothill Transit is at the forefront of the state-wide electrification efforts, we are still learning a lot about scaling our fleet and navigating current utility rate structures, among other things. The most daunting challenge is the high cost of electric buses and infrastructure, and the cost and complexity of electric utility rates for ZEBs. Foothill Transit commissioned consulting firm Burns & McDonnell to analyze our fleet and develop a roll-out plan. They report that it will cost Foothill Transit an additional \$120 million to install charging infrastructure for a 368-bus fleet alone.

We ask that your decision to prioritize the electrification of our transit fleets also leads ARB to prioritize funding electrification efforts. The ICT regulation was adopted on the premise that the mass deployment of zero-emission buses will develop the

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components, supply chains, knowledge and experience necessary to electrify other heavy-duty industries. Foothill Transit, like transit agencies across the state, has accepted this task and is working hard to implement the ICT regulation and provide helpful data to other transit agencies and interested parties. In light of this, we urge you to consider setting aside a portion of the \$40 million for Advanced Technology Demonstrations and Pilot Projects for a large-scale demonstration of zero-emission buses, including infrastructure buildout. We also urge you to modify several of the programmatic changes proposed for HVIP, with the goal of holding transit agencies harmless, regardless of the oversubscription of the program.

We recommend that ARB establish a set-aside for zero-emission buses, ensuring that transit agencies receive a minimum funding level from the program; preserve the voucher enhancement for infrastructure for all transit agencies; and, exclude public fleets from the potential reduction of voucher amounts.

Thank you for your consideration. We look forward to working with you and your staff on the implementation of the ICT regulation.

Sincerely,

Doran J. Barnes
Executive Director

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